

DEC 15 2011

DEBRA VAN PELT  
ISLAND COUNTY CLERK

IN THE SUPERIOR COURT FOR ISLAND COUNTY, WASHINGTON

STATE OF WASHINGTON,

Plaintiff,

vs.

COLTON A. HARRIS-MOORE,

Defendant.

NO. 10-1-00167-1

SECOND AMENDED INFORMATION  
CHARGING:

- COUNT 1 - Theft of a Firearm
- COUNT 2 - Residential Burglary
- COUNT 3 - Residential Burglary
- COUNT 4 - Residential Burglary
- COUNT 5 - Residential Burglary
- COUNT 6 - Identity Theft 1<sup>st</sup> Degree
- COUNT 7 - Burglary in the Second Degree
- COUNT 8 - Burglary in the Second Degree
- COUNT 9 - Burglary in the Second Degree
- COUNT 10 - Identity Theft in the Second Degree
- COUNT 11 - Residential Burglary
- COUNT 12 - Identity Theft in the Second Degree
- COUNT 13 - Computer Trespass -1<sup>st</sup> Degree
- COUNT 14 - Attempting to Elude Pursuing Police Vehicle
- COUNT 15 - Burglary in the First Degree
- COUNT 16 - Theft of a Motor Vehicle

COMES NOW GREGORY M. BANKS, Prosecuting Attorney of Island County, State of Washington, or his deputy, and by this Information accuses the above-named defendant of violating the criminal laws of the State of Washington as follows:

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1 2698 SOUTH CAMANO DRIVE, CAMANO ISLAND, WASHINGTON; contrary to the Revised Code of  
2 Washington 9A.52.025(1).

3 (MAXIMUM PENALTY—Ten (10) years imprisonment and/or a \$20,000.00 fine pursuant to  
4 RCW 9A.52.025(2) and RCW 9A.20.021(1)(b), plus restitution and assessments.)

5 JIS Code: 9A.52.025 Residential Burglary

6 **COUNT V - Residential Burglary**

7 On or about and between the 16th day of May, 2010 through the 18th day of May, 2010,  
8 both days inclusive, in the County of Island, State of Washington, the above-named Defendant,  
9 with intent to commit a crime against a person or property therein, entered or remained  
10 unlawfully in a dwelling, to wit: THE DWELLING OF WILLIAM AND DOREEN WAGNER LOCATED AT  
11 4186 SOUTH CAMANO DRIVE, CAMANO ISLAND, WASHINGTON; contrary to the Revised Code of  
12 Washington 9A.52.025(1).

13 (MAXIMUM PENALTY—Ten (10) years imprisonment and/or a \$20,000.00 fine pursuant to  
14 RCW 9A.52.025(2) and RCW 9A.20.021(1)(b), plus restitution and assessments.)

15 JIS Code: 9A.52.025 Residential Burglary

16 **COUNT VI - Identity Theft in the First Degree**

17 On or about and between the 6th day of June, 2008 through the 16th day of June, 2008,  
18 both days inclusive, in the County of Island, State of Washington, the above-named Defendant  
19 did knowingly obtain, possess, use, or transfer a means of identification or financial information  
20 of another person, living or dead, to wit: RONALD DUANE FREE, with the intent to commit, or to  
21 aid or abet, any crime, and did use the victim's means of identification or financial information  
22 and obtain an aggregate total of credit, money, goods, services, or anything else of value in  
23 excess of one thousand five hundred dollars in value, to wit: a Chase Credit Card, No. \*\*\*\* \*  
24 \*\*\*\* 8037; contrary to the Revised Code of Washington 9.35.020(1) and (2).

25 (MAXIMUM PENALTY—Ten (10) years imprisonment and/or a \$20,000 fine pursuant to  
26 RCW 9.35.020(2) and RCW 9A.20.021(1)(b), plus restitution and assessments.)

27 (ADDITIONAL CIVIL PENALTY—A person who violates this section is liable for civil damages of  
28 one thousand dollars or actual damages, whichever is greater, including costs to repair the  
29 victim's credit record, and reasonable attorneys' fees as determined by the court, pursuant to  
30 RCW 9.35.020(4))

JIS Code: 9.35.020.2 Identity Theft-1

**COUNT VII - - Burglary in the Second Degree**

On or about and between the 4th day of July, 2008 through the 11th day of July, 2008, both days inclusive, in the County of Island, State of Washington, the above-named Defendant, with intent to commit a crime against a person or property therein, entered or remained unlawfully in a building, to wit: CAMANO ISLAND FIRE AND RESCUE STATION LOCATED AT 811 N. SUNRISE BLVD., CAMANO ISLAND, WASHINGTON; contrary to the Revised Code of Washington 9A.52.030(1).

(MAXIMUM PENALTY—Ten (10) years imprisonment and/or a \$20,000.00 fine pursuant to RCW 9A.52.030(2) and RCW 9A.20.021(1)(b), plus restitution and assessments.)

JIS Code: 9A.52.030 Burglary – 2 Degree

**COUNT VIII - Burglary in the Second Degree**

On or about and between the 3rd day of July, 2008 through the 7th day of July, 2008, both days inclusive, in the County of Island, State of Washington, the above-named Defendant, with intent to commit a crime against a person or property therein, entered or remained unlawfully in a building, to wit: ISLAND COUNTY CAMANO ANNEX BUILDING LOCATED AT 121 NE CAMANO DRIVE, CAMANO ISLAND, WA; contrary to the Revised Code of Washington 9A.52.030(1).

(MAXIMUM PENALTY—Ten (10) years imprisonment and/or a \$20,000.00 fine pursuant to RCW 9A.52.030(2) and RCW 9A.20.021(1)(b), plus restitution and assessments.)

JIS Code: 9A.52.030 Burglary – 2 Degree

**COUNT IX - Burglary in the Second Degree**

On or about and between the 2nd day of June, 2009 through the 3rd day of June, 2009, both days inclusive, in the County of Island, State of Washington, the above-named Defendant, with intent to commit a crime against a person or property therein, entered or remained unlawfully in a building, to wit: A DETACHED GARAGE BELONGING TO CECILIA MUSCOLO AT 1225 SUNNYSHORE DRIVE, CAMANO ISLAND, WASHINGTON; contrary to the Revised Code of Washington 9A.52.030(1).

(MAXIMUM PENALTY--Ten (10) years imprisonment and/or a \$20,000.00 fine pursuant to RCW 9A.52.030(2) and RCW 9A.20.021(1)(b), plus restitution and assessments.)

JIS Code: 9A.52.030 Burglary – 2 Degree

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1 (MAXIMUM PENALTY—Five (5) years imprisonment and/or a \$10,000 fine pursuant to  
2 RCW 9.35.020(3) and RCW 9A.20.021(1)(c), plus restitution and assessments.)

3 (ADDITIONAL CIVIL PENALTY—A person who violates this section is liable for civil damages of  
4 one thousand dollars or actual damages, whichever is greater, including costs to repair the  
5 victim's credit record, and reasonable attorneys' fees as determined by the court, pursuant to  
6 RCW 9.35.020(4))

7 JIS Code: 9.35.020.3 Identity Theft-2

8 **COUNT XIII - Computer Trespass in the First Degree**

9 On or about the 10th day of June, 2009, in the County of Island, State of Washington, the  
10 above-named Defendant, without authority, intentionally gained access to a computer system or  
11 electronic database of another, to wit: KATHY McKEE, and the Defendant gained the access  
12 with intent to commit another crime; contrary to the Revised Code of Washington 9A.52.110.

13 (MAXIMUM PENALTY—Five (5) years imprisonment and/or a \$10,000 fine pursuant to  
14 RCW 9A.52.110(2) and 9A.20.021(1)(c), plus restitution and assessments.)

15 JIS Code:

16 **COUNT XIV - Attempting to Elude Pursuing Police Vehicle**

17 On or about the 17th day of July, 2008, in the County of Island, State of Washington, the  
18 above-named Defendant did, as a driver of a motor vehicle, willfully fail or refuse to  
19 immediately bring his or her vehicle to a stop and did drive his or her vehicle in a reckless  
20 manner while attempting to elude a pursuing police vehicle, after having been given a visual or  
21 audible signal to bring the vehicle to a stop, said signal having been given by hand, voice,  
22 emergency light, or siren by a uniformed police officer whose vehicle was equipped with lights  
23 and sirens; contrary to the Revised Code of Washington 46.61.024 and Laws of 2003, Chapter  
24 101.

25 (MAXIMUM PENALTY—Five (5) years imprisonment and/or a \$10,000 fine pursuant to  
26 RCW 46.61.024 and RCW 9A.20.021(1)(c), plus restitution and assessments.)

27 JIS Code: 46.61.024.1 Eluding a Police Vehicle

28 **COUNT XV - BURGLARY IN THE FIRST DEGREE**

29 Between the 2nd day of October, 2009 through the 4th day of October, 2009, both days  
30 inclusive, in the County of Snohomish, State of Washington, the above-named Defendant, with  
intent to commit a crime against a person or property therein, did enter or remain unlawfully in a  
building, to-wit: the residence of ROBERT GLEYRE located at 20819 Menzel Lake Rd., Granite  
Falls, WA, and in entering or while in the building or in immediate flight therefrom, the

1 Defendant or another participant in the crime was armed with a deadly weapon, to wit: a .22  
2 caliber Jennings pistol, serial number 154029; contrary to the Revised Code of Washington  
3 9A.52.020.

4 (MAXIMUM PENALTY—Life imprisonment and/or a \$50,000.00 fine pursuant to RCW  
5 9A.52.020(2) and RCW 9A.20.021(1)(a), plus restitution and assessments.)

6 (If the Defendant has previously been convicted on two separate occasions of a “most serious  
7 offense” as defined by RCW 9.94A.030(28), in this state, in federal court, or elsewhere, the  
8 mandatory penalty for this offense is life imprisonment without the possibility of parole pursuant  
9 to RCW 9.94A.030(32) and 9.94A.570.)

10 **COUNT XVI - THEFT OF A MOTOR VEHICLE**


11 Between the 4<sup>th</sup> day of October, 2009 and the 5th day of October, 2009, both days inclusive, in  
12 the County of Snohomish, State of Washington, the above-named Defendant did wrongfully obtain or  
13 exert unauthorized control over the property of another, to-wit: a 2003 Yukon GMC automobile,  
14 belonging to JAMES GLOVER, or the value thereof, with intent to deprive said person of said property,  
15 said property being a motor vehicle; contrary to the Revised Code of Washington 9A.56.020(1)(a) and  
16 RCW 9A.56.065.

17 (MAXIMUM PENALTY—Ten (10) years imprisonment and/or a \$20,000 fine pursuant to  
18 RCW 9A.56.065 and RCW 9A.20.021(1)(b), plus restitution and assessments.)

19 DATED: Dec 15, 2011.

20 GREGORY M. BANKS  
21 ISLAND COUNTY PROSECUTING ATTORNEY

22 By:

23   
24 GREGORY M. BANKS  
25 PROSECUTING ATTORNEY  
26 WSBA # 22926

27 STANDARD SENTENCE RANGE: Assuming an offender score of 9+: 87-116 months on  
28 Count XV.

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DEFENDANT INFORMATION					
NAME: Colton A. Harris-Moore				DOB: 03/22/1991	
ADDRESS: 925 E. HAVEN PLACE					
CITY, STATE, ZIP: CAMANO ISLAND, WA 98282					
PHONE #(s):			DRIV. LIC. NO.	DL ST	
SEX: M	RACE: W	HGT: 602	WGT: 150	EYES: GRN	HAIR: BRO
OTHER IDENTIFYING INFORMATION					